UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA Hon. André M. Espinosa, U.S.M.J.

> v. Mag. No. 22-11023

ERICK SOLIS CRIMINAL COMPLAINT

I, Elizabeth White, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.

Elizabeth White, Special Agent Federal Bureau of Investigation

Special Agent White attested to this Complaint by telephone pursuant to F.R.C.P. 4.1(b)(2)(A).

January 20, 2022

Date

at

New Jersey

State

United States Magistrate Judge

Name and Title of Judicial Officer

Honorable André M. Espinosa

ATTACHMENT A

COUNT ONE (Enticement of a Minor)

From in or around July 2020 through in or around August 2020, in the District of New Jersey, and elsewhere, the defendant,

ERICK SOLIS,

did knowingly use a facility of interstate and foreign commerce to persuade, induce, entice, and coerce an individual who had not attained the age of 18 years to engage in any sexual activity for which any person can be charged with a criminal offense, namely, production of child pornography, in violation of Title 18, United States Code, Sections 225l(a) and (e).

In violation of Title 18, United States Code, Section 2422(b).

COUNT TWO (Production of Child Pornography)

In or around December 2020, in the District of New Jersey, and elsewhere, the defendant,

ERICK SOLIS,

did knowingly use, persuade, induce, entice, or coerce any minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a means and facility of interstate and foreign commerce, namely by computer.

In violation of Title 18, United States Code, Sections 225l(a) and (e).

ATTACHMENT B

- I, Elizabeth White, am a Special Agent with the Federal Bureau of Investigation ("FBI"). I am fully familiar with the facts set forth herein based on my own investigation, my discussions with other law enforcement officers, and my review of reports, documents, and other items of evidence. Where statements of others are related herein, they are related in substance and in part. Because this Affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.
- 1. At all times relevant to this Complaint, defendant Erick Solis ("SOLIS") was a resident of Weehawken, New Jersey.
- 2. In or around September 2021, the FBI learned about an individual who was using screenname "ericksol966" had utilized an online application to engage a fifteen-year-old female ("Minor Victim-1"), whom a local law enforcement agency interviewed in or around August 2020, in sexually explicit conversations online from in or around July 2020 to in or around August 2020.
- 3. For example, during one conversation on or about July 13, 2020, "ericksol966" asked Minor Victim-1, "Mmm thoughts on anal? Would you let master fill up all your holes?" Furthermore, "ericksol966" told Minor Victim-1, "if I ever visit you I would be rubbing you. Fingering you . . . maybe be touching your boobs and squeezing it." Additionally, in that same conversation, "ericksol966" asked Minor Victim-1, "What will your friend friends/teachers think if I picked you up from school? . . . Because I would kiss you and in the car give your throat a firm grip." Then, "ericksol966" asked if Minor Victim-1 can have a "sleepover" and that he would make her "cum for hours."
- 4. On or about July 13, 2020, "ericksol966" instructed Minor Victim-1 take a sexually explicit video of herself and send it to him through the application. He said to Minor Victim-1, "Show me in a video how you're moving. And show your little fuck hole."
- 5. In or around September 2021, the FBI learned from a local law enforcement agency that "ericksol966" had utilized an online messenger application to engage another fifteen-year-old female ("Minor Victim-2"), whom the local law enforcement agency interviewed in or around February 2021, in sexually explicit conversations online from in or around July 2020 to in or around February 2021.
- 6. For example, during one conversation on or about November 27, 2020, "ericksol966" told Minor Victim-2, "I would easily glide my hands into your

panties. . . [t]hen slide into your little fuck hole as I kiss your neck . . . I'll choke you until you pass out."

- 7. Additionally, during their communications, "ericksol966" ordered that Minor Victim-2 take sexually explicit photographs and videos of herself and send them to him through the online application. At least on one occasion, in or around December 2020, Minor Victim-2 complied with the request and sent to "ericksol966" a video of her masturbating, with her vaginal area visible.
- 8. The investigation revealed that the offending "ericksol966" had the name, "Erick Solis" on his online application profile and that he had sent to another application username a video of a male individual who was masturbating. Law enforcement subsequently identified this male individual as SOLIS. A further review of "ericksol966" revealed that during one conversation with Minor Victim-2, SOLIS mentioned that he had to conduct a real estate showing. Law enforcement was later able to confirm that SOLIS was a real estate agent in New Jersey.
- 9. The investigation revealed that the account to which SOLIS used to communicate and request the offending photographs and videos from Minor Victim-1 and Minor Victim-2 was utilized by Internet Protocol addresses that were associated with a subscriber of an internet service provider registered to an address in Weehawken, New Jersey ("SOLIS' Residence"). An inquiry with the New Jersey Motor Vehicle Commission database established that this address was in fact SOLIS' home of residence. Furthermore, on or about December 30, 2021, law enforcement conducted surveillance of that address and observed an individual who appeared to be SOLIS exit it from that building.
- 10. Based on the foregoing, on or about January 20, 2022, law enforcement executed a search warrant at SOLIS' Residence. During the search, SOLIS was present at SOLIS' Residence. SOLIS acknowledged that he is "ericksol966" on the online application, that he had engaged in communications with Minor Victim-1 and Minor Victim-2 on the online application, and that he had received the abovementioned video from Minor Victim-2.